

The Honorable Barbara J. Rothstein
The Honorable S. Kate Vaughan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

MATTHEW WRIGHT,

Plaintiff,

v.

STATE OF WASHINGTON, et al.,

Defendants.

Case No. C23-1326-BJR-SKV

STIPULATED MOTION TO EXTEND
DISCOVERY DEADLINE

Note on Motion Calendar: December 4,
2024

The Parties, by and through counsel, stipulate to and jointly request the relief set forth herein

I. RELIEF REQUESTED

Plaintiff and Defendants request relief from a deadline established by the Order Continuing Trial Date and Extending Pretrial Deadlines (ECF 29). Specifically, the parties request the Court continue the deadline for completing discovery in order to allow a deposition that has been requested but has not been successfully scheduled, the deposition of Christine Gomes. The parties request an extension of 17 days:

Event	Date	Proposed Date
Discovery completed by	December 20, 2024	January 6, 2025

II. STATEMENT OF FACTS

The Counsels for both parties have been successfully working together to move the case forward. We have discussed the topics for scheduling a deposition of the primary defendant Christine Gomes since August of 2024. The defendant's counsel has been working to locate and schedule a deposition with Christine Gomes, however he has been unable to get in contact with her for a prolonged period of time. The plaintiff's counsel filed a motion to compel discovery on November 26, 2024. When the defendant's counsel successfully contacted Gomes on December 2, 2024, Gomes' availability could not be coordinated with the availability of the plaintiff's counsel before the current deadline for completion of discovery on December 20, 2024.

Thus, both parties request an extension of the discovery deadline for the limited purpose of conducting the deposition of Christine Gomes. The parties believe the deposition will be completed no later than January 6, 2025, and that no other pretrial dates or the trial date will be impacted by the requested continuance.

III. ISSUE PRESENTED

Should the Court grant a brief extension of the deadline for the completion of discovery for the limited purpose of conducting the deposition of Christine Gomes under which the parties are jointly requesting the extension that no other dates established by the court will be affected?

IV. ARGUMENT AND AUTHORITY

The parties recognize the Court's discretion to grant or deny this request; however they submit that their cooperation and the scheduling of the deposition of Christine Gomes amount to good cause for the limited extension requested.

V. CONCLUSION

For the reasons set forth herein, the parties jointly request the Court briefly extend the deadline for completion of discovery to allow the deposition of Christine Gomes to be scheduled and conducted in due course.

1 Dated this 4th day of December, 2024

2 s/ Darryl Parker

3 Darryl Parker, WSBA #30770

4 Attorney for Plaintiff

5 Dated this 4th day of December, 2024

6 s/ John E. Justice

7 John E. Justice, WSBA #23042

8 Attorney for Defendant

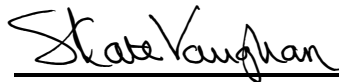
ORDER

Pursuant to the stipulation of the parties, and for good cause shown, the Case Schedule Order is modified as follows:

EVENT	CURRENT DEADLINE	NEW DEADLINE
Discovery completed by	December 20, 2024	January 6, 2025

Furthermore, in light of the parties' stipulation and this Order, Plaintiff's motion to compel discovery, Dkt. 33, shall be STRICKEN, with leave to re-file if the deposition of Christine Gomes does not occur within the anticipated timeframe.

Dated this 5th day of December, 2024.



S. KATE VAUGHAN
United States Magistrate Judge

CERTIFICATE OF SERVICE

I, Luke Park, under penalty of perjury under the laws of the State of Washington, declare as follows:

I am a legal assistant at the Civil Rights Justice Center, PLLC, and am over the age of 18. On the date in the manner indicated below, I caused the foregoing STIPULATED MOTION TO EXTEND DISCOVERY DEADLINES and this CERTIFICATE OF SERVICE to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of the filing to all counsel of record.

DATED: this 4th day of December 2024, at Seattle, Washington.

/s/ Luke Park
Luke Park, Legal Assistant